

NATIONAL SECURITY COUNSELORS

4702 LEVADA TERRACE
ROCKVILLE, MD 20853

TELEPHONE: (301) 728-5908
FACSIMILE: (240) 681-2189

KEL MCCLANAHAN, ESQ., EXECUTIVE DIRECTOR (admitted in DC, NY, WA)
EMAIL: KEL@NATIONALSECURITYLAW.ORG
BRADLEY P. MOSS, ESQ., DEPUTY EXECUTIVE DIRECTOR (admitted in DC, IL)

9 April 2024

Hon. Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States District Courthouse
500 Pearl Street
New York, NY 10007

Re: *Rolling Stone, LLC v. DOJ*, Case No. 23-10741

Dear Judge Liman:

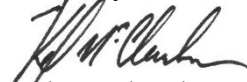
On behalf of Plaintiff Rolling Stone, LLC, I respectfully submit this letter motion to again modify the briefing schedule currently established for the motion for partial summary judgment currently due today, 9 April 2024.¹ Defendant consents to this Motion.

I have good cause to file this Motion, and I sincerely apologize for the lateness of its filing. As I was finalizing the motions in question, I learned that the in-house counsel of Rolling Stone with whom I have been coordinating had an unavoidable conflict and would not be able to complete her review in time for a midnight filing as originally intended. Accordingly, I request a brief extension until this Friday—with corresponding extensions of future deadlines—to allow for Rolling Stone's internal review process to be completed.

After coordinating with Defendant's counsel, I respectfully request that the Court enter the following schedule for Plaintiff's forthcoming motion for partial summary judgment.

12 April – Plaintiff's motion
22 May – Defendant's opposition
14 June – Plaintiff's reply

Sincerely,



Kel McClanahan
Counsel for Plaintiff Rolling Stone

¹ This schedule will also apply to the two related procedural motions—which may be combined into a single motion—that I currently intend to file contemporaneously with my motion for partial summary judgment.